

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

AEROSPACE SOLUTIONS, LLC, §
Plaintiff, §
v. § Civil Action No. 1:24-cv-01383-DII
§
GREGORY W. ABBOTT, in his official §
capacity as Governor of the State of Texas; §
and GLENN A. HEGAR, in his official §
capacity as Texas Comptroller of Public §
Accounts, §
Defendants. §

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
RESPONSIVE PLEADING**

Defendants, Gregory W. Abbott, in his official capacity as Governor of the State of Texas, and Glenn A. Hegar, in his official capacity as Texas Comptroller of Public Accounts, (Defendants”), files this unopposed motion seeking to extend the deadline to file a responsive pleading to Plaintiff’s Original Complaint (Dkt. 1).

1. Plaintiff filed its Original Complaint on November 14, 2024.
2. Defendants were each served November 20, 2024.
3. The current answer deadline is December 11, 2024.
4. Undersigned counsel for Defendants was assigned the case on December 9, 2024.

Undersigned counsel has an appellate brief due January 6, 2025, discovery responses due over the next two weeks, and a family vacation scheduled for December 28, 2024 to January 4, 2025.

5. Defendants respectfully request the deadline to file a responsive pleading to Plaintiff’s Original Complaint be extended until January 13, 2025.

6. Federal Rule of Civil Procedure 6(b)(1)(A) provides that the Court may extend filing deadlines at its discretion. Defendant seeks this extension of time to file its responsive pleading for good cause shown and in the interest of justice, and not to cause unnecessary delay. Extending the Defendants' deadline to file its responsive pleading will allow it to more fully brief the issues for the Court and Plaintiff, and will work to the conservation of both judicial and party resources. No party will be prejudiced if the extension sought herein is granted.

7. Plaintiff's counsel has been contacted regarding the substance of this motion and has confirmed no opposition to the relief requested in this extension.

8. For the reasons stated above, Defendants request that this Court extend the deadline to file a responsive pleading to Plaintiff's Original Complaint to January 13, 2025.

Respectfully submitted.

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

RALPH MOLINA
Deputy First Assistant Attorney General

JAMES LLOYD
Deputy Attorney General for Civil Litigation

KIMBERLY GDULA
Chief, General Litigation Division

/s/ William H. Farrell
WILLIAM H. FARRELL
Assistant Attorney General
Texas Bar No. 00796531
biff.farrell@oag.texas.gov

Office of the Attorney General
General Litigation Division
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548
(512)936-2650 | FAX: (512) 320-0667

Attorneys for Defendants

CERTIFICATE OF SERVICE

I certify that that on December 9, 2024, this document was filed electronically via the Court's CM/ECF system, causing electronic service upon all counsel of record.

/s/ William H. Farrell
WILLIAM H. FARRELL
Assistant Attorney General

CERTIFICATE OF CONFERENCE

I hereby certify that undersigned counsel for defendants conferred with Erin Wilcox, counsel for Plaintiff, via phone on December 9, 2024, on the matter in this motion. Ms. Wilcox stated that Plaintiff is unopposed to the relief sought by this motion.

/s/ William H. Farrell
WILLIAM H. FARRELL
Assistant Attorney General